UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

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IN RE: TERRORIST ATTACKS) Civil Action No. 03 MDL 1570 (GBD) (SN)
ON SEPTEMBER 11, 2001)
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This document relates to:

Addesso v. Kingdom of Saudi Arabia, 16-cv-09937 (GBD) (SN) Aguilar v. Kingdom of Saudi Arabia, 16-cv-09663 (GBD) (SN) Aiken v. Kingdom of Saudi Arabia, 17-cv-00450 (GBD) (SN) Bowrosen v. Kingdom of Saudi Arabia, 16-cv-08070 (GBD) (SN) DeSimone v. Kingdom of Saudi Arabia, 17-cv-00348 (GBD) (SN) Hodges v. Kingdom of Saudi Arabia, 17-cv-00117 (GBD) (SN) McCarthy v. Kingdom of Saudi Arabia, 16-cv-08884 (GBD) (SN)

MOTION TO EXTEND *PRO HAC VICE*ADMISSION TO ALL CONSOLIDATED MDL CASES

PLEASE TAKE NOTICE that the Kingdom of Saudi Arabia ("Kingdom") hereby moves this Court for an Order extending the *pro hac vice* admissions of Michael K. Kellogg and Gregory G. Rapawy to all consolidated multi-district litigation ("MDL") cases before this Court.

I, Michael K. Kellogg, was admitted as counsel *pro hac vice* on March 10, 2004 for purposes of this MDL and Civil Action Nos. 02-cv-6977, 02-cv-7300, 03-cv-5071, 03-cv-5493, 03-cv-5738, 03-cv-6978, 03-cv-7036, and 03-cv-9849. *See* Dkt. 17. My colleague Gregory G. Rapawy was admitted *pro hac vice* on September 11, 2015, for purposes of this MDL and Civil Action Nos. 03-cv-6978, 03-cv-8591, 04-cv-7216, 04-cv-1922, and 04-cv-7065. *See* Dkt. 3031.

As the Court is aware, several additional cases have been consolidated into this MDL in recent months, and more are expected. Moving for *pro hac vice* admission in

each related case would be cumbersome and would require repeated applications to the Court. The Kingdom moves the Court to extend counsel's *pro hac vice* admission to all cases consolidated into 03 MDL 1570, now or in the future, and to permit counsel to appear in the above captioned cases by filing notices of appearance, and to do the same in other consolidated MDL cases as appropriate.

Dated: March 28, 2017 Washington, D.C.

Respectfully submitted,

/s/ Michael K. Kellogg

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CERTIFICATE OF SERVICE

I hereby certify that, on March 28, 2017, I caused copies of the foregoing motion to be served electronically pursuant to the Court's ECF system on all counsel of record.

/s/ Michael K. Kellogg
Michael K. Kellogg